
Appendix H
Fire Prevention Plan

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[Note: This is a preliminary document that provides an overview of the proposed content for the final Fire Prevention and Response Plan that will be prepared for the Desert Southwest Transmission Project. This is NOT a complete plan at present, and is not intended for implementation until all necessary information has been included.]

APPENDIX H – FIRE PREVENTION AND RESPONSE PLAN

INTRODUCTION

This Fire Prevention and Response Plan (FPRP) has been developed and included as a component of the Construction, Operation, and Maintenance (COM) Plan for the proposed Desert Southwest Transmission Project (Project). The main purposes of this FPRP are the following:

- To outline fire prevention and responsibilities for responsible agencies and parties.
- To develop and prescribe notification procedures to be implemented in the event of a fire.
- To provide fire prevention measures and identify parties responsible for their implementation.
- To present activity-related precautions for minimizing potential fires.
- To establish fire prevention and suppression equipment.
- To develop post-fire rehabilitation strategies.
- To institute fire suppression contracts related to fire prevention and suppression needs.

The ultimate goals of this FPRP are (1) to minimize potential fire risks associated with the construction of a project and (2) to provide immediate and effective fire suppression in the event of an accidental fire associated with construction activities.

FIRE MANAGEMENT REGULATIONS

The Project is subject to all federal, state, and local laws, ordinances, regulations, and standards (LORS) related to the prevention and suppression of fires during construction activities. Additionally, the design of the transmission line and related facilities will conform to all federal, state, and local LORS and recognized industrial standards. Such requirements are provided below:

[Section to identify and describe requirements of federal, state, and local fire prevention-related LORS.]

OTHER RELATED PLANS

Construction, Operation, and Maintenance Plan – This FPRP is an integral part of the COM Plan developed for the Project.

Blasting Plan – Blasting is not currently proposed for the Project. However, if blasting becomes necessary to clear localized rock deposits that cannot be removed by conventional construction equipment, a Blasting Plan will be developed for the Project. This Blasting Plan will incorporate all applicable regulations as well as provided environmental mitigation measures to minimize risks and impacts associated with the transport, storage, and proper use of explosives. The Blasting Plan will address issues associated with the potential of fire prevention and suppression that may be associated with blasting.

Reclamation Plan– In the event that a fire occurs, the Project will implement post-fire rehabilitation strategies. Post-fire rehabilitation will include the use of native vegetation seed mixtures for reestablishing vegetation and measures for noxious weed control. A Reclamation Plan will be prepared which identifies specific restoration.

PLAN RESPONSIBILITIES

The three main parties that are responsible for developing, implementing, and enforcing the measures contained within this FPRP are the Bureau of Land Management (BLM), the Imperial Irrigation District (IID), and the construction contractor(s). A discussion of the general responsibilities of these parties is provided in the following sections.

Bureau of Land Management

BLM responsibilities associated with the implementation of the FPRP include the following:

- BLM will be responsible for all overall fire control activities in their jurisdictional area.
- BLM will be responsible for all communications with IID regarding fire protection stipulations and actions to be taken regarding fire prevention and suppression.
- BLM will be responsible for notifying IID and the construction contractor(s) regarding changes to the FPRP as a result of altering fire conditions in the construction site.
- BLM will assign a “Compliance Inspector” to the Project that will be responsible for enforcing the FPRP and other activities related to fire prevention, control, and suppression.

Imperial Irrigation District

IID, or its project manager, will be responsible for overall development and implementation of the FPRP. Consequently, IID will provide or be responsible for the following:

- IID will define the minimal fire protection requirements needed during on-site and off-site construction activities.
- IID will establish basic fire fighting training requirements for construction personnel.
- IID or its contractors will be responsible for implementing post-fire rehabilitation of damaged areas resulting from a fire event.

- IID will require its contractors to initiate and implement fire control activities associated with construction.
- IID and its contractors will comply with federal, state, and local fire prevention and suppression LORS.
- IID will provide a representative to accompany the BLM-designated Compliance Inspector during routine fire inspection of the construction area.
- IID will take all necessary action to correct any deficiencies noted by the BLM-assigned Compliance Inspector.
- IID will be responsible for notifying its contractor(s) to reduce or stop operation that pose an undue fire hazard, until appropriate corrective actions can be implemented.
- IID will provide all available tools, equipment, and manpower to control a fire event.

Construction Contractor(s)

The construction contractor(s) will be responsible for assigning a person to implement and enforce the FPRP and for overall fire prevention associated with construction activities for the Project. The designated person will be identified as the “Project Fire Marshal”. The Project Fire Marshal will be responsible for the following:

- Performing regular inspection of all equipment and tools to ensure that fire suppression equipment is operating correctly and that all tools meet fire manufacturers recommended prevention specifications.
- Conducting routine inspection of all areas that store and handle flammable substances to ensure that FPRP specifications are implemented and maintained and to ensure compliance with all fire prevention-related LORS.
- Providing “No Smoking” signs and posting fire rules at proper locations, including high risk locations, and posting fire rules at strategic locations along the construction site.
- Initiating the preliminary fire response in the project area.
- Notifying the BLM-assigned Compliance Inspector of all proposed burn activities associated with construction.
- Ensuring that all personnel associated with construction activities which may pose a fire risk are familiar with the FPRP and receive basic training in responding to fire events.
- Being available at specific job sites during special activities that pose a high fire hazard or fire safety issues.
- Providing reporting requirements in accordance with the notification procedures identified in the FPRP for all wildfires in the area.
- Assuming initial Fire Marshal responsibilities during fires until relieved by the BLM-assigned Compliance Inspector or the jurisdictional fire responding agency.

FIRE NOTIFICATION

IID, the designated contractor's Fire Marshal, and/or construction personnel will notify the BLM-assigned Compliance Inspector regarding a fire event as soon as possible. Additionally, the appropriate jurisdictional fire responding agency shall be notified. A list of these fire agencies are provided as follows:

General Non-Emergency Telephone Numbers in the Project Area

City of Blythe Fire Department
201 North Commercial
Blythe, California
(760) 922-6117

Riverside Fire Department
140 West Bernard
Blythe, California
(760) 921-7822

City of Niland Fire Department
8071 Luxor Avenue
Niland, California
(760) 359-0410

Imperial County Fire Department
2514 La Brucherie Road
Imperial, CA
(760) 355-1191

Bureau of Land Management
63500 Garnet Avenue
Palm Springs, CA
(760) 251-4800

California Department of Forestry
Fire Call (800) 472-5697

Following verbal notification of all required parties, IID and/or their designated representative will develop a written documentation of the fire event.

GENERAL FIRE PREVENTION MEASURES

General fire prevention measures that will be implemented during construction of the Project include the following:

- A no smoking policy will be established during operation of equipment and for workers operating in or along vegetative areas.
- Safe "designated smoking areas" will be established at construction sites.
- Ashtrays will be provided in designated smoking areas to discard tobacco and match products.
- All construction burns will obtain a "Burn Permit" prior to the burn event.
- All fires will be properly extinguished and covered with non-combustible material such as soil or sand.
- During a high fire risk period, all appropriate safeguards and preventative measures will be implemented at all job sites.
- All appropriate personnel involved in Project construction will receive information on appropriate section of the FPRP.

- Personnel will receive proper training in emergency response and notification procedures for responding to fire events.
- All flammable materials will be cleared for at least 10 feet from locations where a fire or flame could generate a fire event.
- Non-construction-related ignition sources (e.g., barbecues and campfires) will not be allowed at the construction site.

ACTIVITY RELATED FIRE PREVENTION MEASURES

Burning Events

IID and/or the contractor will obtain a Burn Permit prior to **all** burn events, regardless of the season. IID and/or the contractor will include in the Burn Permit application all applicable information (e.g., site fuel, weather information, quantity of material to be burned, and type of material to be burned) regarding the burn event. A trained person identified by IID and/or the contractor will be responsible for conducting the burn activity. Additionally, vehicles with fire suppression equipment will be at the burn site during the burn event. All burn activities will be suspended when air quality or weather pose a potential environmental impact. IID and/or the contractor will notify the BLM-assigned Compliance Inspector of all proposed burn events.

Blasting Activities

Blasting is not currently proposed for activities associated with the construction of the Project. If blasting is required, a Blasting Plan will be developed and included in the COM Plan. All blasting activities will require clearing of vegetation from the site for at least 10 feet around the area to be blasted. Equipment with fire suppression equipment will be staged near the blast site to respond to potential fires. Additional fire prevention and suppression measures specific to blasting activities will be identified as necessary in the Blasting Plan.

Welding Operation

IID or their assigned representative will approve any welding or cutting operation that could generate a spark or fire. All welding or cutting operations will occur in areas that have been cleared of vegetation for at least 10 feet. All welding or cutting operations will be provided with fire suppression equipment (e.g., fire extinguisher).

Tobacco Smoking

Smoking rules and regulations and the locations of designated smoking areas will be provided to site personnel during job orientation by the contractor's Fire Marshal. IID and/or the contractor's Fire Marshal will establish designated smoking areas and provide ashtrays in designated areas. All designated smoking areas will be cleared of vegetation. Smoking will be prohibited in all construction locations during fire danger seasons and high fire risk situations. Additionally, fire will be prohibited while operating equipment or for workers operating in vegetated areas.

Warning Devices

Use of open-flame warning devices (e.g., torches, fuses, and highway flares) at construction job sites shall be prohibited. Only warning devices using an electrical source or battery will be authorized for use in the transmission line right-of-way and construction areas.

Vehicle Parking and Storage Area

All vehicle parking, storage areas, and stationary engine sites will be cleared of all vegetation and flammable materials. Additionally, all areas used for dispensing or storage of gasoline, diesel fuel, or oil products will be cleared of vegetation and other flammable materials. These areas will be posted with a sign identifying the area as a “No Smoking” area.

Flammable Waste Materials

All flammable waste (e.g., oil filters, oily rags, used containers, solid waste, and discarded oil) will be properly stored in designated temporary disposal areas. Additionally, only proper containers will be used for the storage of waste materials. All of these materials will be disposed of in accordance with federal, state, and local LORS. Only manufacturers supplied containers or U.S. Department of Transportation (U.S. DOT) specified containers will be used for transporting and on-site storage and use of flammable products.

Equipment Fueling Locations

Designated personnel, trained for these operations, will perform all refueling operations. Refueling of motor vehicles will be performed at designated locations at the close or prior to start of the workday, whenever practical. Job site refueling operations will be performed by trained personnel using designated trucks and equipment. All fueling vehicles will be equipped with a 35-pound fire extinguisher specified to extinguish petroleum and electrical fires.

Right-Of-Way Access

The Contractor(s) will be responsible for providing continuous access along all job site locations for emergency fire fighting vehicles and related equipment during construction of the Project transmission line.

FIRE PREVENTION AND SUPPRESSSION EQUIPMENT

Fire Prevention Equipment Requirements

The following fire prevention procedures and/or equipment will be available or provided during the construction of the Project:

- All portable internal combustion engines (e.g., generators, compressors, brush trimmers, and chain saws) exhaust will be equipped with manufacturer recommended spark arrestors and these spark arrestors will always be maintained in good working order.

- Portable communication devices (e.g., radio or cellular telephones) and emergency telephone numbers will be available to local work crews for notification of the contractor's designated Fire Marshal and the local fire response departments.
- Burn Permits will be obtained prior to all Project set fires.
- A trained person and/or the contractor's Fire Marshal will only be assigned to conducting permitted burn events.

Fire Suppression Equipment Requirements

The following fire response and/or fire suppression equipment will be available during construction of the Project:

- Trained fire suppression personnel and fire suppression equipment will be established at key location(s), and the personnel and equipment will be capable of responding to a fire within 15 minutes of notification.
- All refueling trucks and locations will be equipped with a 35-pound capacity fire extinguisher (at a minimum) capable of suppressing both gas and electrical fires.
- One backpack pump system that has been filled with water will be maintained at each welding site, and two backpack pumps systems will be located at each wood cutting area, transmission tower site under construction, or other construction location with a fire risk.
- A 500-gallon water tank truck will be available during construction of the Project that is equipped with 250 feet of ¾-inch inside diameter heavy duty rubber hose on a wheel or live hose basket; a 20 gallon per minute (gpm), 150 pound per square inch (psi) portable or power takeoff pump capable of operating for two hours; a gear type pump capable of providing a bypass or pressure relief valve; a tanker unit equipped with a nozzle shutoff; at least 12 feet of hard suction hose with a capability of drafting with an intake screen adapter; and 250 feet of one inch cotton jacket, rubber-lined hose capable of supplying a stream, spray, or fog of water.

POST-FIRE REHABILITATION

The goals of establishing a post-fire rehabilitation policy is to provide the following:

- The restoration of native vegetation and high quality wildlife habitats.
- The restoration of the value of the rangeland.
- The minimization of invasive weeds introduction into the environment.
- The decrease in the fire risk of the area.
- The minimization of soil erosion.

Containment of noxious or invasive weeds will be performed by monitoring the fire-impacted areas during and after reseeding. These monitoring activities will include the following:

- All off-road vehicles and all-terrain vehicles will be inspected and high-pressure air or water washed at key vehicle locations (e.g., axles, frame, cross members, motor mounts, steps, running boards, front bumpers, and brush guards) as necessary to avoid the transport of weeds to the reclamation area.
- Other equipment that will be transported into or through the rehabilitation area will be high-pressure air or water washed to remove mud, dirt and other foreign materials.
- Employees working in or near the rehabilitation area will receive basic training for the identification of noxious or invasive weeds.